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ENGINEERING EVALUATION / FACT SHEET

BACKGROUND INFORMATION

Application No.:	R13-3097A
Plant ID No.:	017-00059
Applicant:	Crestwood Appalachia Pipeline LLC (Crestwood)
Facility Name:	Victoria Compressor Station
Location:	Salem, Doddridge County
NAICS Code:	221210 (Natural Gas Distribution)
Application Type:	Modification
Received Date:	April 11, 2014
Engineer Assigned:	Jerry Williams, P.E.
Fee Amount:	$1,000.00
Date Received:	April 11, 2014
Complete Date:	May 2, 2014
Due Date:	July 31, 2014
Applicant Ad Date	April 8, 2014 (HR), April 9, 2014 (ET)
Newspaper:	*The Herald Record*
UTM's:	Easting: 528.784 km Northing: 4,355.724 km Zone: 17
Description:	Modification of a natural gas compressor station. This permitting action will keep this facility as a synthetic minor for greenhouse gas (CO_2e) emissions.

DESCRIPTION OF PROCESS

The following process description was taken from Permit Application R13-3097A:

The Victoria Compressor Station provides for the removal of entrained water from the natural gas pipeline stream and compression of the natural gas stream. Liquids rich gas flow into the site from nearby natural gas well heads and small compressor stations. Free water will be removed via an in-line separator. Additional water will be removed via a tri-ethylene glycol (TEG) dehydration system.

The purpose of this permit application is for the following:

- Add a new C800 microturbine generator bank (GEN-1) instead of the previously permitted generator engines (GEN-1, GEN-2). The microtubine engine is a Capstone model C800 NG, which consists of four (4) natural gas microturbines that will be programmed such that no more than three (3) operate simultaneously.
- Add a new 98% annual fuel usage cap on the eleven (11) compressor engines (CE-1 – CE-11) in order to maintain the site as a minor source of CO_2e.
- Revise the compressor engines horsepower (HP) rating from 1,627 HP to 1,680 HP on the eleven (11) compressor engines (CE-1 – CE-11) to reflect revised information from the engine vendor.
- Provide a revised NSCR catalyst specification sheet of the engine catalysts.
- Add a safety factor of 20% to the regenerator emissions for the glycol dehydration units (RSV-1, RSV-2) to account for gas composition variability.
- Revise glycol dehydrator emissions to reflect previously represented 95% control of flash tank by routing vapors to the dehydrator reboiler.
- Revise the vapor recovery unit (VRU) capture efficiency to 95%.
- Revise storage tank (T-1 – T-5) and loading rack (LR-1) throughputs to better reflect actual site throughputs.
- Minor revisions to storage tank capacities to reflect changes to the previously permitted storage tanks.

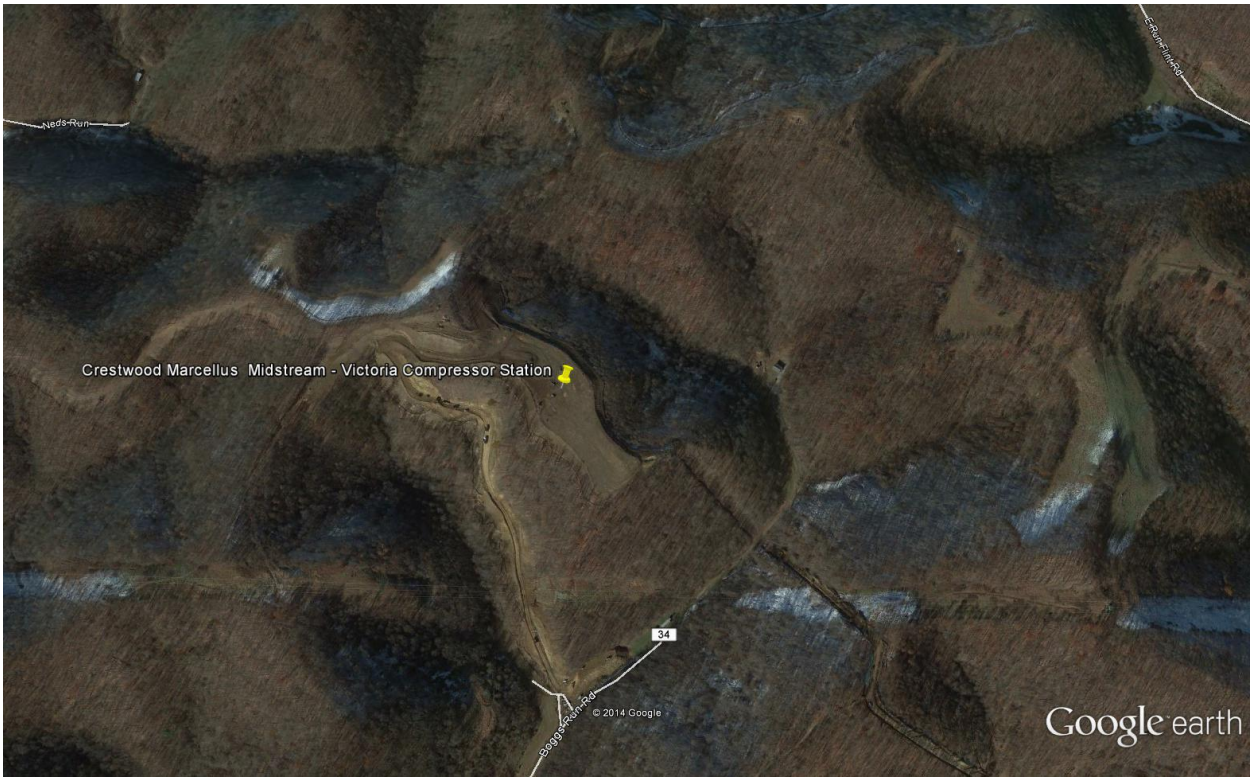
SITE INSPECTION

A site inspection was conducted on July 11, 2013 by Doug Hammell of the DAQ Enforcement Section. According to Mr. Hammell, the site location is appropriate for the proposed facility. The closest residence is approximately 465 feet away.

Latitude: 39.350481
Longitude: -80.665933

Directions as given in the permit application are as follows:

From Victoria: Travel east on US Route 50 for about 9.5 miles. Turn left onto County Route 9 (Tarklin Run Road), then take an immediate left on County Route 50/27 and travel 0.2 miles. Turn right onto County Route 3 (Big Flint Road) and travel 4.7 miles, then turn right onto County Route ¾ (Boggs Run Road) and proceed 0.7 miles to the access road to the site.



ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER

Emissions associated with this modification application consist of the combustion emissions from eleven (11) natural gas fired compressor engines (CE-1 – CE-11), one (1) microturbine (GEN-1), two (2) TEG dehydrator still vents (RSV-1, RSV-2), two (2) TEG dehydrator reboilers (RBV-1, RBV-2), five (5) 400 bbl tanks (settling, condensate, produced water) (T-1 – T-5), five (5) miscellaneous storage tanks (waste oil, bulk glycol, LP Drain, coolant, bulk oil) (T-6, T-10), one (1) product loadout rack (LR-1), two (2) vapor recovery units (VRU-1, VRU-2) and fugitive emissions. Fugitive emissions for the facility are based on calculation methodologies presented in EPA Protocol for Equipment Leak Emission Estimates. The following table indicates which methodology was used in the emissions determination:

Emission Point ID#	**Process Equipment**	**Calculation Methodology**
CE-1E – CE-11E	1,680 hp Waukesha 7044 GSI Reciprocating Internal Combustion Engine (RICE) w/ NSCR	Manufacturer's Data, EPA AP-42 Emission Factors
GEN-1E, GEN-2E	402 HP Natural Gas Fired Generators (Primary and Backup)	Manufacturer's Data, EPA AP-42 Emission Factors
RSV-1E, RSV-2E	60 mmscfd TEG Dehydrator Still Vent w/ Condenser/Recycle	GRI-GlyCalc 4.0
RBV-1E, RBV-2E	1.5 MMBtu/hr TEG Dehydrator Reboiler	EPA AP-42 Emission Factors
T-1	600 bbl (25,200 gal) Produced Water/Condensate Settling Tank	EPA Tanks 4.09d and Gas Oil Ratio Method (Flashing)
T-2	400 bbl (16,800 gal) Produced Water Storage Tank	EPA Tanks 4.09d and Gas Oil Ratio Method (Flashing)
T-3	400 bbl (16,800 gal) Produced Water Storage Tank	EPA Tanks 4.09d and Gas Oil Ratio Method (Flashing)
T-4	400 bbl (16,800 gal) Condensate Storage Tank	EPA Tanks 4.09d and Gas Oil Ratio Method (Flashing)
T-5	400 bbl (16,800 gal) Condensate Storage Tank	EPA Tanks 4.09d and Gas Oil Ratio Method (Flashing)
T-6	2,000 gal Waste Oil Storage Tank	Negligible
T-7	1,000 gal Bulk Glycol Storage Tank	Negligible
T-8	2,000 gal Compressor Lube Oil Storage Tank	Negligible
T-9	1,000 gal Coolant Storage Tank	Negligible
T-10	2,000 gal Engine Lube Oil Storage Tank	Negligible
LR-1	14,600 bbl/yr Condensate 131,400 bbl/yr Produced Water Loadout Rack	EPA AP-42 Emission Factors, TCEQ Guidance. Submerged Loading
VRU-1	Vapor Recovery Unit #1	Electric Driven
VRU-2	Vapor Recovery Unit #2	Electric Driven

The following table indicates the control device efficiencies that are required for this facility:

Emission Unit	Pollutant	Control Device	Control Efficiency
1,680 hp Waukesha 7044 GSI RICE w/ NSCR (CE-1 – CE-11)	Nitrogen Oxides	NSCR	96.3 %
	Carbon Monoxide		96.9 %
	Volatile Organic Compounds		23.2 %
	Formaldehyde		20 %
	Methane		79.5 %
60 mmscfd TEG Dehydrator Still Vents (RSV-1, RSV-2)	Volatile Organic Compounds	Condenser and Combustion Recycle	98 %
	Hazardous Air Pollutants		98 %

On January 1, 2014 (effective date of rule) there were revisions to the Greenhouse Gas (GHG) Rule that will affect the Global Warming Potential (GWP) values of several pollutants. The GWP for methane increased from 21 to 25 and nitrous oxide decreased from 310 to 298. Crestwood utilized these revised factors in this permit application in the calculation of their GHG potential.

The total facility emissions after this proposed modification are shown in the following table:

Pollutant	Maximum Pre-Modification Annual Facility Wide Emissions (tons/year)	Maximum Post-Modification Annual Facility Wide Emissions (tons/year)	Net Facility Wide Emissions Changes (tons/year)
Nitrogen Oxides	31.34	90.26	58.92
Carbon Monoxide	61.03	73.97	12.94
Volatile Organic Compounds	74.92	94.05	19.13
Particulate Matter-10	13.07	13.03	-0.04
Sulfur Dioxide	0.40	0.42	0.02
Formaldehyde	2.42	7.00	4.58
Total HAPs	13.09	18.86	5.77
Carbon Dioxide Equivalent	99,413	100,932	1,519

Maximum detailed controlled point source emissions were calculated by Crestwood and checked for accuracy by the writer and are summarized in the table on the next page. There will be an annual fuel usage limitation placed on the total of all eleven (11) engines. Each individual engine will still be permitted to operate at 100% load at any given time, but the aggregate fuel usage limit will be set at 98% of full load. This will ensure that CO_2e emissions remain below 45CSR30 and 45CSR14 thresholds. According to 45CSR14 Section 2.43.e, fugitive emissions are not included in the major source determination because it is not listed as one of the source categories, therefore, CO_2e emissions for the facility will be 99,391 tons per year.

The following table indicates what the potential emissions from the facility will be when the engines are operated at 98% of full load.

Crestwood Appalachia Pipeline LLC – Victoria Compressor Station (R13-3097A)

Emission	Source	NO_x		CO		VOC		PM-10/2.5		SO_2		Formaldehyde		Total HAPs		CO_2e
Point ID#		lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	lb/hr	ton/year	ton/year
CE-1E	Compressor Engine #1	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-2E	Compressor Engine #2	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-3E	Compressor Engine #3	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-4E	Compressor Engine #4	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-5E	Compressor Engine #5	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-6E	Compressor Engine #6	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-7E	Compressor Engine #7	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-8E	Compressor Engine #8	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-9E	Compressor Engine #9	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-10E	Compressor Engine #10	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
CE-11E	Compressor Engine #11	1.86	8.00	1.48	6.37	1.11	4.77	0.27	1.17	<0.01	0.035	0.15	0.64	0.31	1.35	8485
GEN-1E	Microturbine Generator	0.24	1.05	0.66	2.89	0.06	0.26	0.01	0.06	<0.01	0.03	<0.01	0.01	<0.01	0.01	3505
RSV-1E	Dehydrator Still Vent	0	0.00	0	0	2.59	11.33	0	0	0	0	0	0	0.33	1.46	514
RBV-1E	Dehydrator Reboiler	0.14	0.61	0.12	0.51	0.01	0.03	0.01	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	734
RSV-2E	Dehydrator Still Vent	0	0.00	0	0	2.59	11.33	0	0	0	0	0	0	0.33	1.46	514
RBV-2E	Dehydrator Reboiler	0.14	0.61	0.12	0.51	0.01	0.03	0.01	0.05	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	734
VRU-1/2	Vapor Recovery Unit for	0	0.00	0	0	NA	3.16	0	0	0	0	0	0	NA	0.1	54
LR-1	Loadout Rack	0	0.00	0	0	NA	1.67	0	0	0	0	0	0	NA	0.02	0
Fugitive	Component Leaks	0	0.00	0	0	NA	8.73	0	0	0	0	0	0	NA	0.87	601
Fugitive	Venting	0	0.00	0	0	NA	4.79	0	0	0	0	0	0	NA	0.1	892
Fugitive	Rod Packing	0	0.00	0	0	NA	0.22	0	0	0	0	0	0	NA	<0.01	48
Total	**Total Facility PTE**	**20.61**	**90.26**	**17.18**	**79.97**	**17.47**	**94.05**	**3.00**	**13.03**	**0.10**	**0.42**	**1.65**	**7.00**	**4.07**	**18.86**	**100932**

REGULATORY APPLICABILITY

The following rules apply to this modification:

45CSR13 (Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation)

45CSR13 applies to this source due to the fact that Crestwood is seeking to modify their current permit R13-3079 with replacement equipment and add an annual fuel usage cap on the eleven (11) compressor engines (CE-1 – CE-11) in order to maintain the site as a minor source of CO_2e.

Because a limitation was placed on CE-1 – CE-11 to remain below major source thresholds for CO_2e, Crestwood is subject to Notice Level C (45CSR13 Section 8.5) and will be required to publish a commercial display ad (45CSR13 Section 8.4.a) and post a visible sign at their facility (45CSR13 Section 8.5.a).

Crestwood paid the appropriate application fee and published the required legal advertisement for a construction permit application.

45CSR22 (Air Quality Management Fee Program)

Crestwood is not subject to 45CSR30. The Victoria Compressor Station is subject to 40CFR60 Subparts JJJJ and OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

Crestwood is required to pay the appropriate annual fees and keep their Certificate to Operate current.

40CFR60 Subpart JJJJ (Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (SI ICE))

40CFR60 Subpart JJJJ establishes emission standards for applicable SI ICE.

The 1,680 hp Waukesha 7044 GSI RICE (CE-1 – CE-11) were manufactured after the July 1, 2010 date for engines with a maximum rated power capacity greater than or equal to 500 hp.

The proposed 1,680 hp Waukesha 7044 GSI RICE (CE-1 – CE-11) will be subject to the following emission limits: NOx – 1.0 g/hp-hr (3.71 lb/hr); CO – 2.0 g/hp-hr (7.42 lb/hr); and VOC – 0.7 g/hp-hr (2.59 lb/hr). Based on the manufacturer's specifications for these engines, the emission standards will be met.

The proposed 1,680 hp Waukesha 7044 GSI RICE (CE-1 – CE-11) are not certified by the manufacturer to meet the emission standards listed in 40CFR60 Subpart JJJJ. Therefore, Crestwood will be required to conduct an initial performance test and conduct

subsequent performance testing every 8,760 hours or three (3) years, whichever comes first, to demonstrate compliance.

40CFR63 Subpart HH (National Emission Standards for Hazardous Air Pollutants for Oil and Natural Gas Production Facilities)

Subpart HH establishes national emission limitations and operating limitations for HAPs emitted from oil and natural gas production facilities located at major and area sources of HAP emissions. The glycol dehydration unit at the Victoria Compressor Station is subject to the area source requirements for glycol dehydration units. However, because the facility is an area source of HAP emissions and the actual average benzene emissions from the glycol dehydration unit is below 0.90 megagram per year (1.0 tons/year) it is exempt from all requirements of Subpart HH except to maintain records of actual average flowrate of natural gas to demonstrate a continuous exemption status.

40CFR63 Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines)

Subpart ZZZZ establishes national emission limitations and operating limitations for HAPs emitted from stationary RICE located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations. The engines (CE-1 – CE-11) at the Victoria Compressor Station are subject to the area source requirements for non-emergency spark ignition engines.

The applicability requirements for new stationary RICEs located at an area source of HAPs, is the requirement to meet the standards of 40CFR60 Subpart JJJJ. These requirements were outlined above. The proposed engine meets these standards.

Because these engines will not be certified by the manufacturer, Crestwood will be required to perform an initial performance test within 180 days from startup, and subsequent testing every 8,760 hours or 3 years, whichever comes first.

The following rules do not apply to the facility:

45CSR30 (Requirements for Operating Permits)

Crestwood is not subject to 45CSR30. The Victoria Compressor Station is subject to 40CFR60 Subparts JJJJ and OOOO, however they are exempt from the obligation to obtain a permit under 40 CFR part 70 or 40 CFR part 71, provided they are not required to obtain a permit for a reason other than their status as an area source.

40CFR60 Subpart Kb (Standards of Performance for VOC Liquid Storage Vessels)

40CFR60 Subpart Kb does not apply to storage vessels with a capacity less than 75 cubic meters. One of the tanks (T-1) that Crestwood has proposed to install is larger than 75 cubic meters. However, the settling storage tank (T-1) is exempt from this rule due to the exemption listed in 40CFR60.110b(d)(4). This provision is an exemption for storage vessels with a design capacity less than or equal to 1,589.874 cubic meters (420,000 gallons) used for petroleum or condensate stored, processed, or treated prior to custody transfer. Therefore, the 25,200 gallon storage tank storing condensate/produced water would not be subject to this rule.

40CFR60 Subpart KKK (Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants)

40CFR60 Subpart KKK applies to onshore natural gas processing plants that commenced construction after January 20, 1984, and on or Before August 23, 2011. The Victoria Compressor Station is not a natural gas processing facility, therefore, Crestwood is not subject to this rule.

45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants)

45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment)

The Victoria Compressor Station is located in Doddridge County, which is an unclassified county for all criteria pollutants, therefore 45CSR19 is not applicable to the Victoria Compressor Station.

As shown in the following table, Crestwood is not a major source subject to 45CSR14 or 45CSR19 review. According to 45CSR14 Section 2.43.e, fugitive emissions are not included in the major source determination because it is not listed as one of the source categories in Table 1. Therefore, the fugitive emissions are not included in the PTE below.

Pollutant	PSD (45CSR14) Threshold (tpy)	NANSR (45CSR19) Threshold (tpy)	Victoria PTE (tpy)	45CSR14 or 45CSR19 Review Required?
Carbon Monoxide	250	NA	73.97	No
Nitrogen Oxides	250	NA	90.26	No
Sulfur Dioxide	250	NA	0.42	No
Particulate Matter 2.5	250	NA	13.03	No
Ozone (VOC)	250	NA	94.05	No
Greenhouse Gas (CO_2e)	100,000	NA	99,391	No

This permitting action will keep this facility as a synthetic minor for greenhouse gas (CO_2e) emissions. A limitation was placed on fuel usage for engines (CE-1E – CE-11E) to make this source a synthetic minor source of greenhouse gas (CO_2e) emissions to remain below major source thresholds for CO_2e.

TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. Crestwood included the following HAPs as emitted in substantive amounts in their emissions estimate: Benzene, Ethylbenzene, Formaldehyde, Toluene, and Xylene. The following table lists each HAP's carcinogenic risk (as based on analysis provided in the Integrated Risk Information System (IRIS)):

HAPs	Type	Known/Suspected Carcinogen	Classification
Formaldehyde	VOC	Yes	Category B1 - Probable Human Carcinogen
Benzene	VOC	Yes	Category A - Known Human Carcinogen
Ethylbenzene	VOC	No	Inadequate Data
Toluene	VOC	No	Inadequate Data
Xylenes	VOC	No	Inadequate Data

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health effects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, *there are no federal or state ambient air quality standards for these specific chemicals*. For a complete discussion of the known health effects of each compound refer to the IRIS database located at *www.epa.gov/iris*.

AIR QUALITY IMPACT ANALYSIS

Modeling was not required of this source due to the fact that the facility is not subject to 45CSR14 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollutants) or 45CSR19 (Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution which Cause or Contribute to Nonattainment) as shown in the table listed in the Regulatory Discussion section under 45CSR14/45CSR19.

SOURCE AGGREGATION

"Building, structure, facility, or installation" is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person.

The Victoria Compressor Station is located in Doddridge County and will be operated by Crestwood.

1. The Victoria Compressor Station will operate under SIC code 4932 (Natural Gas Distribution). There are other compressor stations operated by Crestwood that share the same two-digit major SIC code of 49 for natural gas transmission. Therefore, the Victoria Compressor Station does share the same SIC code as other Crestwood compressor stations.

2. "Contiguous or Adjacent" determinations are made on a case by case basis. These determinations are proximity based, and it is important to focus on this and whether or not it meets the common sense notion of a plant. The terms "contiguous" or "adjacent" are not defined by USEPA. Contiguous has a dictionary definition of being in actual contact; touching along a boundary or at a point. Adjacent has a dictionary definition of not distant; nearby; having a common endpoint or border.

   There are no Crestwood properties in question that are considered to be on contiguous or adjacent property with the Victoria Compressor Station. The closest Crestwood well site is more than one (1) mile from this site. The land between these sites is not owned or managed by Crestwood. Operations separated by these distances do not meet the common sense notion of a plant. Therefore, the properties in question are not considered to be on contiguous or adjacent property.

3. Common control. The natural gas well sites that supply the incoming natural gas streams to the Victoria Compressor Station are not under common control, and are owned and operated by Crestwood Resources.

Because the facilities are not considered to be on contiguous or adjacent properties and are not under common control, the emissions from the Victoria Compressor Station should not be aggregated with other facilities in determining major source or PSD status.

MONITORING OF OPERATIONS

Crestwood will be required to perform the following monitoring:

- Monitor and record quantity of natural gas consumed for all engines and combustion sources.
- Monitor all applicable requirements of 40CFR60 Subparts JJJJ and OOOO.
- Monitor the presence of the flare pilot flame with a thermocouple or equivalent.

Crestwood will be required to perform the following recordkeeping:

- Maintain records of the amount of natural gas consumed and hours of operation for all engines and combustion sources.
- Maintain records of testing conducted in accordance with the permit. Said records shall be maintained on-site or in a readily accessible off-site location
- Maintain the corresponding records specified by the on-going monitoring requirements of and testing requirements of the permit.
- Maintain records of the visible emission opacity tests conducted per the permit.
- Maintain a record of all potential to emit (PTE) HAP calculations for the entire facility. These records shall include the natural gas compressor engines and ancillary equipment.
- Maintain records of all applicable requirements of 40CFR60 Subparts JJJJ and OOOO.
- Maintain records of the flare design evaluation.
- The records shall be maintained on site or in a readily available off-site location maintained by Crestwood for a period of five (5) years.

RECOMMENDATION TO DIRECTOR

The information provided in the permit application indicates that Crestwood meets all the requirements of applicable regulations. Therefore, impact on the surrounding area should be minimized and it is recommended that the Victoria Compressor Station should be granted a 45CSR13 modification permit for their facility.

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Jerry Williams, P.E.
Engineer

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Date